

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

SHEMARIAH DEROUX,

Plaintiff,

v.

BOBBCAT FILMS, LLC, et al.,

Defendants.

Case No. 1:25-cv-01566-LMM

**DEFENDANT SHANE JOHNSON’S RESPONSE TO PLAINTIFF  
SHEMARIAH DEROUX’S MOTION FOR TO DISMISS**

COMES NOW Defendant Shane Johnson a/ka/ Shane Johnson-Bobb (“Johnson”) and files this Opposition, in part, to Plaintiff Shemariah Deroux’s (“Plaintiff”) Motion to Dismiss.

Johnson opposes dismissal of Plaintiff’s breach of contract claim against Johnson without prejudice. Plaintiff gave up that claim when she failed to respond to Johnson’s Motion to Dismiss. Thus, Plaintiff is procedurally barred from re-capturing her breach of contract claim through a dismissal without prejudice and later re-filing of the breach of contract claim.

Plaintiff made the affirmative decision to not file a response to Shane Johnson’s Motion to Dismiss (Dkt. 30). Thus, Plaintiff indicated that she did not oppose the Motion pursuant to Local Rule 7.1(B). Plaintiff should not be allowed to

recapture the claim through procedural maneuvering. Thus, Court should order that Plaintiff's breach of contract claim is dismissed with prejudice.

Respectfully submitted this 3rd day of September, 2025.

/s/Robin L. Gentry  
Zachary C. Eyster  
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Kennington R. Groff  
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**CERTIFICATE OF COMPLIANCE**

I hereby certify that the foregoing pleading complies with the font and point selections approved by the Court in Local Rule 5.1C. This pleading has been prepared in Times New Roman 14-point font.

Respectfully submitted this 3rd day of September, 2025

/s/ Robin L. Gentry  
Robin L. Gentry  
Georgia Bar. No. 289899

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**CERTIFICATE OF SERVICE**

The foregoing DEFENDANT SHANE JOHNSON’S RESPONSE TO MOTION TO DISMISS which automatically and contemporaneously sends electronic notification and a service copy of this filing to all counsel of record.

This September 3, 2025

/s/ Robin L. Gentry

Robin L. Gentry

Georgia Bar No. 289899